

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CENTRO PRESENTE, a membership organization,
et al.,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., President of the United
States, in his official capacity, *et al.*,

Defendants.

No. 1:18-cv-10340 (DJC)

JOINT STATUS REPORT

As directed by this Court’s March 25, 2022 Order (ECF No. 161), following submission of the parties’ last Joint Status Report on March 14, 2022 (ECF No. 159), Plaintiffs and Defendants respectfully submit this Joint Status Report. The parties jointly request for this Court to extend the stay in this case to September 14, 2022, in light of the ongoing mediation at the Ninth Circuit concerning the Temporary Protected Status (“TPS”) determinations at issue in this case—Haiti, El Salvador, and Honduras.

As discussed in previous status reports, the Department of Homeland Security published a Federal Register Notice formally announcing the Secretary’s new designation for Haiti. 86 Fed. Reg. 41,863 (Aug. 3, 2021). In addition, as previously discussed, the Secretary of Homeland Security published a new Federal Register Notice extending TPS documentation for, *inter alia*, El Salvador and Honduras through December 31, 2022. *See, e.g.*, Continuation of Documentation for Beneficiaries of Temporary Protected Status Designations for El Salvador, Haiti, Nicaragua, Sudan, Honduras, and Nepal, 86 Fed. Reg. 50,725 (Sept. 10, 2021). In the meantime, the terminations of TPS for Haiti, El Salvador and Honduras remain either enjoined or stayed per court

order. *See Ramos v. Nielsen*, No. 18-16981 (9th Cir.) (June 25, 2021, order staying consideration of rehearing en banc petition for appeal, and thus stay of any mandate, pending mediation); *Bhattarai v. Nielsen*, Case No. 3:19-cv-731-EMC (N.D. Cal.), ECF No. 23, at ¶ 6 (court order staying termination of TPS for Honduras pending *Ramos* appeal).

The parties in *Ramos* continue to be engaged in mediation at the Ninth Circuit. Accordingly, in light of the ongoing mediation, the parties respectfully request to continue the stay in this matter through September 14, 2022.

Respectfully submitted,

Plaintiffs.

By their attorneys,

/s/ Justin Wolosz

Eric J. Marandett (BBO# 561730)
Justin J. Wolosz (BBO# 643543)
Anna S. Roy (BBO# 703884)
CHOATE, HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110
(617) 248-5000

Oren Sellstrom (BBO# 569045)
Iván Espinoza-Madrigal (Admitted *Pro Hac Vice*)
LAWYERS FOR CIVIL RIGHTS
61 Batterymarch Street, 5th Floor
Boston, Massachusetts 02110
(617) 988-0624

Dated: June 14, 2022

Defendants

By their attorneys,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney
General

BRIGHAM J. BOWEN
Assistant Branch Director

/s/ Adam Kirschner

ADAM D. KIRSCHNER
IL Bar. No. 6286601
Senior Trial Counsel
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW, Room 11020
Washington, DC 20530
Tel: (202) 353-9265
Fax: (202) 616-8460
Email: adam.kirschner@usdoj.gov

Mailing Address:

Post Office Box 883
Washington, D.C. 20044

Courier Address

1100 L Street NW, Room 11020
Washington, D.C. 20005

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: June 14, 2022

/s/ Adam Kirschner

Adam Kirschner